

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, et al.,

Plaintiffs,

v.

ALEX STAMOS, et al.,

Defendants.

Case No. 3:23-cv-00571-TAD-KDM

**PLAINTIFFS’ CONSENT MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT
FOR THEIR RESPONSES TO DEFENDANTS’ JOINT MOTION TO DISMISS AND
JOINT MOTION TO COMPEL INDIVIDUAL ARBITRATION**

Pursuant to this Court’s Local Rules, Plaintiffs Jill Hines and Jim Hoft respectfully request the Court’s leave to file overlength response briefs to Defendants’ “Joint Motion to Compel Individual Arbitration, Dismiss Plaintiffs’ Class Claims, and Stay All Proceedings, or Alternatively To Transfer Venue Under 28 U.S.C. § 1404,” Doc. 69 (“Joint Motion to Compel Arbitration”); and to Defendants’ Joint Motion to Dismiss, Doc. 70. Plaintiffs have conferred with counsel for Defendants, who have consented to this request. In support, Plaintiffs state as follows:

The two motions present lengthy and extensive arguments regarding personal jurisdiction, Article III standing, First Amendment defenses, the merits of Plaintiffs’ claims, the existence of state action, arbitrability, and other complex legal issues. The number and complexity of these issues warrants a detailed response to ensure that the Court receives a full and complete presentation of the disputed issues. For these reasons, Plaintiffs respectfully request leave to exceed the page limit for their Responses to the Joint Motion to Compel Arbitration, Doc. 69, and

Joint Motion to Dismiss, Doc. 70. Plaintiffs' Responses are approximately 51 pages and 64 pages, respectively.

CONCLUSION

For these reasons, Plaintiffs respectfully request leave to exceed the page limit for their Responses to Defendants' Joint Motion to Compel Arbitration, Doc. 69, and Joint Motion to Dismiss, Doc. 70.

Dated: October 17, 2023

Respectfully submitted,

<p>AMERICA FIRST LEGAL</p> <p><u>/s/ Gene P. Hamilton</u> Gene P. Hamilton, GA Bar No. 516201* Reed D. Rubinstein, DC Bar No. 400153* Nicholas R. Barry, TN Bar No. 031963* Michael Ding, DC Bar No. 1027252* Juli Z. Haller, DC Bar No. 466921* James K. Rogers, AZ Bar No. 027287* Andrew J. Block, VA Bar No. 91537* 611 Pennsylvania Ave SE #231 Washington, DC 20003 (202) 964-3721 gene.hamilton@aflegal.org reed.rubinstein@aflegal.org nicholas.bary@aflegal.org michel.ding@aflegal.org juli.haller@aflegal.org james.rogers@aflegal.org andrew.block@aflegal.org</p>	<p>JAMES OTIS LAW GROUP, LLC</p> <p><u>/s/ D. John Sauer</u> D. John Sauer, Mo. Bar No. 58721* Justin D. Smith, Mo. Bar No. 63253* 13321 North Outer Forty Road, Suite 300 St. Louis, Missouri 63017 (314) 562-0031 John.Sauer@james-otis.com</p> <p>* admitted <i>pro hac vice</i></p> <p>LANGLEY & PARKS, LLC</p> <p>By: <u>/s/ Julianna P. Parks</u> Julianna P. Parks, Bar Roll No. 30658 4444 Viking Drive, Suite 100 Bossier City, Louisiana 71111 (318) 383-6422 Telephone (318) 383-6405 Telefax jparks@languelparks.com</p>
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CERTIFICATE OF SERVICE

I hereby certify that, on October 17, 2023, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer